

WILLOUGHBY & HOEFER, P.A.
ATTORNEYS & COUNSELORS AT LAW

MITCHELL M. WILLOUGHBY
JOHN M.S. HOEFER
RANDOLPH R. LOWELL**
TRACEY C. GREEN
CHAD N. JOHNSTON
JOHN W. ROBERTS
ELIZABETH ZECK*
ELIZABETHANN L. CARROLL
ANDREW J. D'ANTONI
R. WALKER HUMPHREY, II***
ANDREW R. HAND****
J. JOSEPH OWENS

ELIZABETH S. MABRY
J. PATRICK HUDSON
OF COUNSEL

JOSEPH H. FARRELL, III
SPECIAL COUNSEL

OFFICES:

COLUMBIA

930 RICHLAND STREET
P.O. BOX 8416
COLUMBIA, SC 29202-8416

AREA CODE 803
TELEPHONE 252-3300
FAX 256-8062

CHARLESTON

133 RIVER LANDING DRIVE
SUITE 200
CHARLESTON, SC 29492

AREA CODE 843
TELEPHONE 619-4426
FAX 619-4430

September 24, 2021

*ALSO ADMITTED IN TEXAS

**ALSO ADMITTED IN WASHINGTON, D.C.

***ALSO ADMITTED IN CALIFORNIA

****ALSO ADMITTED IN NORTH CAROLINA

VIA EMAIL AND ELECTRONIC FILING

Richard L. Whitt, Esquire
Whitt Law Firm, LLC
401 Western Lane, Suite E
Irmo, SC 29063
richard@rlwhitt.law

John D. Burns, Esquire
Carolinas Clean Energy Business Association
811 Ninth Street, Suite 120-158
Durham, NC 27705
counsel@carolinasceba.com

Re: Dominion Energy South Carolina, Incorporated's 2021 Avoided Cost Proceeding
Pursuant to S.C. Code Ann. Section 58-41-20(A); Docket No. 2021-88-E

Dominion Energy South Carolina's First Set of Written Interrogatories and Request
for Production of Documents and Things to Carolinas Clean Energy Business
Association

Duty to Supplement Discovery Responses

Dear Counsel:

On June 16, 2021, counsel for Dominion Energy South Carolina, Inc. ("DESC") filed and served DESC's First Set of Written Interrogatories and Request for Production of Documents and Things ("DESC Discovery Request") upon the Carolina Clean Energy Business Association ("CCEBA"). Among other things, the instructions provide that, "these requests are continuing in nature and require you to supplement or amend your answer in a timely manner if you learn that

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the answer is incorrect or incomplete or if you identify additional documents or information responsive to this request.”

Based upon an oral motion made during the hearing in the above captioned case, the Public Service Commission of South Carolina (“Commission”) granted your client the opportunity to file limited¹ supplemental surrebuttal testimony. Should CCEBA choose to file limited Supplemental Surrebuttal Testimony, we wish to draw your attention to CCEBA’s continuing duty to supplement its discovery responses and to request that, simultaneously with the filing of the testimony, CCEBA also supplement its responses to DESC’s Discovery Request. In particular, we respectfully ask that you confer with Witness Burgess and instruct him to preserve and produce at the same time that his testimony is filed all workpapers, studies, and/or analyses prepared, relied upon, or used by him in the analysis and preparation of his Supplemental Surrebuttal Testimony. More particularly, we draw your attention to DESC Discovery Requests numbered 1-2, 1-5, 1-6, and 1-7, but, of course, CCEBA should review all requests in DESC Discovery Request and supplement all responses as appropriate. If some analysis or workpapers may be provided before the testimony is filed, please do so. Should CCEBA fail to supplement its responses as requested herein, DESC will be prejudiced in its ability to prepare to respond to and cross-examine witness Burgess about his Supplemental Surrebuttal Testimony.

Should you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,

WILLOUGHBY & HOEFER, P.A.


Mitchell Willoughby

MW/lla

cc: All parties of record
The Honorable Jocelyn G. Boyd

¹ Limited to addressing the corrections made in the Corrected Rebuttal Testimony of DESC Witness David. *See* Order No. 2021-638.